

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ASHLEY H. THOMPSON, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION NO.: 2:06cv420-TFM
)	
GEO MARINE, INC., et al.,)	

MOTION FOR EXTENSION OF TIME TO FILE
DISCLOSURE OF EXPERT WITNESSES

COME NOW, Plaintiffs in the above-styled cause respectfully move for an extension of time to file their disclosures of expert witnesses. For cause Plaintiffs state as follows:

Plaintiffs have only this week retained the services of new counsel. New counsel have not had an opportunity to research or retain the services of experts. It is anticipated that Plaintiffs will engage the services of vocational expert Dr. Nancy Crumpton, Ed.D., who has agreed to review the case. However, at this time Plaintiffs do not have the curriculum vitae or a report for submission.

The above-considered Plaintiffs respectfully request a thirty-day extension of time.

Dated this the 17th day of January, 2007.

/s/ K. Anderson Nelms

K. Anderson Nelms

THE LAW OFFICES OF JAY LEWIS, LLC

By: Keith Anderson Nelms (ASB-6972-E63K)

Attorney for Plaintiffs

847 S. McDonough Street

Montgomery, AL 36104

(334) 263-7733

Fax: (334) 832-4390

andynelms@jaylewislaw.com

nelmsandy@hotmail.com

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing to counsel of record listed below by filing the same with the Clerk of the Court via CM/ECF which will send a copy to the following on this the __17th__ day of January, 2007.

S. Anthony Higgins, Esq.

/s/ K. Anderson Nelms

K. Anderson Nelms

THE LAW OFFICES OF JAY LEWIS, LLC

By: Keith Anderson Nelms (ASB-6972-E63K)

Attorney for Plaintiffs

847 S. McDonough Street

Montgomery, AL 36104

(334) 263-7733

Fax: (334) 832-4390

andynelms@jaylewislaw.com

nelmsandy@hotmail.com